

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Jon Niermann, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 8, 2016

Mr. Gary Miller, Remedial Project Manager
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

RECEIVED
16 JAN 14 PM 3:55
SUPERFUND DIV.
REMEDIATION BRANCH
(6SF-R)

Re: *Draft Addendum 3 Groundwater Study, Sampling and Analysis Plan, November 2015*
(Groundwater SAP). San Jacinto River Waste Pits Federal Superfund Site, Harris County,
Texas

Dear Mr. Miller:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the Groundwater SAP and we have the following comments.

1. The groundwater Sampling and Analysis Plan (SAP) proposes the use of passive groundwater sampling method using Solid-Phase Microextraction (SPME) at six existing groundwater monitoring wells and eight proposed groundwater monitoring wells. The TCEQ noted that low-flow sampling technique was used for the collection of groundwater analytical data presented in the *Remedial Investigation Report*, Anchor QEA, LLC and Integral Consulting Inc., May 2013. To establish a baseline comparison between the concentrations measured using low-flow sampling technique and the passive sampling method, collection of groundwater samples for all congeners of 2,3,7,8-TCDD, 2,3,7,8-TCDF, and 2,3,4,7,8-PentaCDF using low-flow sampling technique contemporaneously with the passive sampling method may be more appropriate.
2. Section 3.2.3 of the Groundwater SAP proposes abandonment of groundwater monitoring wells following data reporting and EPA approval. It would be beneficial to keep the groundwater monitoring wells and establish a long-term groundwater monitoring program to ensure non-migration of COCs into the groundwater over time.
3. For the area north of I-10, the Groundwater SAP proposes installation of two groundwater monitoring wells (SJMWO11 and SJMW013) at a 45 degree angle from

9647182



Mr. Gary Miller, Remedial Project Manager

Page 2

January 8, 2016

vertical. Please clarify how annular materials (filter pack, bentonite slurry, etc.) on an angular slope are installed such that they are placed at desired intervals and are evenly distributed around the well casing.

If you have any questions, please contact me at 512-239-3548.

Sincerely,



Satya Dwivedula, Project Manager
Superfund Section
Remediation Division
Texas Commission on Environmental Quality

SD/cw

cc: Valmichael Leos, On-Scene Coordinator, U.S. EPA, Region 6, Superfund Division (6SF-RA)

Carlos Sanchez, Branch Chief, U.S. EPA, Region 6, Superfund Division